PATENT APPLICATION

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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In re Application of :
Thompson et al.

Serial No: 09/738,293

Group Art Unit: 2174

Filed: December 18, 2000

Examiner: CHUONG, Truc T.

For: Method And System For Supporting Communications Within A Virtual Team Environment

Assistant Commissioner for Patents
Alexandria, VA 22313-1450

MAIL STOP APPEAL BRIEF -PATENTS

Sir:

APPELLANT'S BRIEF UNDER 37 C.F.R. § 1.192

Pursuant to 37 C.F.R. § 1.191, the Applicant submitted a Notice of Appeal from the Examiner to the Board of Patent Appeals and Interferences on June 28, 2004. Specifically, the Applicant takes appeal from the Examiner's rejection of claims 1-50, 53-58, 61 and 63-65 under 35 U.S.C. § 103(a). The Notice of Appeal was filed in response to the Examiner's Final Action (paper No. 6) mailed May 5, 2004. Pursuant to 37 C.F.R. § 1.192, the Applicant now submits the following brief.

1) Real Party in Interest

The real party of interest is Nortel Networks Limited, by virtue of an assignment executed by the inventors in favour of Nortel Networks Limited recorded at Reel/Frame 011384/0237.

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2) **Related Appeals and Interferences**

None.

3) **Status of claims**

Pursuant to the Final Action (paper No. 6) mailed April 26, 2004, the status of the claims is as follows:

(a) claims 1-47, 49, 50, 53-58, 61 and 63-65 stand rejected under 35 U.S.C. § 102(b), as being unpatentable over the teaching of United States Patent No. 5,793,365 (Tang et al.) in view of United States Patent No. 5,995,492 (Klein et al.);

(b) claim 48 stands rejected under 35 U.S.C. § 103(a), as being unpatentable over the teaching of United States Patent No. 5,793,365 (Tang et al.) in view of United States Patent No. 5,995,492 (Klein et al.) and further in view of "Applicant Prior Art"; and

(c) claims 51, 52, 59, 60 and 62 are objected to.

4) **Status of Amendments**

No amendments were submitted in the Applicant's response filed June 28, 2004, to the Final Office Action (paper No. 6) mailed May 5, 2004. Accordingly, the claims remain as amended in the Applicant's response filed on February 20, 2004. A copy of the current claims is provided in the Appendix below.

5) **Summary of Invention**

The present invention is generally directed to methods and systems for facilitating collaboration among geographically-dispersed team members. More particularly, the present invention provides a distributed application which comprises a collaboration services suite adapted to enable a communications session between at least two of the team members "over at least a switched telephone network (STN)", and "a team member interface adapted to display the dynamic presence and availability information to each member of the team, and to enable a team member to request initiation by the collaboration services suite of a communications

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session with at least one other team member over at least the switched telephone network (STN)". Thus the present invention provides each team member with enhanced possibilities for communications within the team. In particular, a team member is made aware of communications devices associated with each team member, and the availability of the team member to be reached using each of those communications devices. The team member can also use the team member interface to request the initiation of communications with another team member. This functionality extends to communications over the STN, such as the Public Switched Telephone Network (PSTN).

6) **Issues**

The following issues presented for review by the Board of Patent Appeals and Interferences are as follows:

(a) Whether the Examiner has properly established *prima facie* obviousness of claims 1-47, 49, 50, 53-58, 61 and 63-65 based on the combination of Tang et al. and Klein et al.; and

(b) Whether the Examiner has properly established *prima facie* obviousness of claim 48 based on the combination of Tang et al., Klein et al. and Applicant Prior Art.

7) **Grouping of Claims**

Claims 1-65 are pending in the present application. Of these, claims 1 and 63 are independent claims. The issues presented for review can be decided with reference to claims 1, 47, 48 and 63.

8) **Argument**

In order to facilitate review by the Board, the Applicant's arguments are presented in the following order:

- The Examiner's rejection of claim 1under 35 U.S.C. § 103(a);
- The Examiner's rejection of claims 47 and 48 under 35 U.S.C. § 103(a);

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- The Examiner's rejection of claim 63 under 35 U.S.C. § 103(a);
- Brief description of the cited references;
- Has the Examiner established *prima facie* obviousness of claim 1;
- Has the Examiner established *prima facie* obviousness of claims 47 and 48; and
- Has the Examiner established *prima facie* obviousness in respect of claim 63

Arguments pertaining to each of these points are presented below under equivalent sub-headings.

(i) The Examiner's rejection of claim 1 under 35 U.S.C. § 103(a)

In the Final Office Action (Paper No. 6) mailed on April 26, 2004, the Examiner asserted (at paragraph 4 of the Examiner's detailed action) that:

> As to claim 1 ... although Tang mentions using telephones in his invention (col. 6, lines 47-50), Tang does not clearly show in details how each member of the team communications over at least a switched telephone network. Klien clearly shows a virtual switching point in a public switched telephone (col. 17 lines 64-67, col. 18 lines 1-28 and FIG. 1) to switch from one telephone to a different telephone. It would be obvious ... that a person with ordinary skill in the art would want to have Klein's virtual switching feature in Tang's communication devices in order to have an ultimate implementation when user can manually control virtual switches to avoid network congestion.

(ii) The Examiner's rejection of claims 47 and 48 under 35 U.S.C. § 103(a)

In the Final Office Action (Paper No. 6) mailed on April 26, 2004, the Examiner asserted (at page 13 of the final action) that:

> As to claim 47, Tang teaches a distributed application as claimed in claim 46, wherein each of first and second voice communications devices

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have respective unique addresses, and the collaboration services suite comprises a virtual switching point adapted to:

> establish a call connection between a first service switching point (SSP) in a switched telephone network (STN) and the first voice communications device; establish a call connection between the first SSP and a second SSP in the STN; and establish a call connection between the second SSP in the STN and the second voice communications device to enable voice communications between the first and second voice communications devices. (col 14, lines 40-58)

It will be seen that the Examiner's "reasons for rejection" of claim 47 is, in fact, nothing more than a recitation of claim 47 itself, with a reference to (col 14, lines 40-58) of Tang et al appended at the end. Thus the Examiner has made no attempt to show how the cited reference expressly or impliedly suggest[s] the claimed invention. Nor has the Examiner presented any line of reasoning (convincing or otherwise) as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the cited references.

At paragraph 5 of the Examiner's detailed action, the Examiner asserted that:

> As to claim 48, the modified system of Tang teaches a distributed application as claimed in claim 47 ... (See claim 47 above); however, the modified system of Tang does not teach that the call connection between the first and second communications devices is completed in part over first and second Enhanced Integrated Services Digital Network User Part (E-ISUP) truncks in the STN"

This latter feature, the Examiner purports to find in Applicant's admitted prior art, and concludes:

> "It would have been obvious at the time of the invention that the E-ISUP of APD could have been implemented in the modified environment

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of Tang, so that the system can be used to process a variety of connected sources throughout the network."

A review of the Examiner's detailed action shows that the Examiner has not articulated any purported "modified system of Tang" except by reciting the features of claim 47. It is therefore apparent that the Examiner's "modified system of Tang" is, in fact, nothing more nor less than applicant's own claimed invention.

(iii) The Examiner's rejection of claim 63 under 35 U.S.C. § 103(a)

In the Final Office Action (Paper No. 6) mailed on April 26, 2004, the Examiner asserted (at paragraph 4 of the Examiner's detailed action) that:

> As to claim 63 Tang teaches ...a collaboration services suite adapted to establish a multi-media communications session between two or more members of the team in response to a request from any one of the team members using a data network to enable an exchange of video content between data terminals of team members involved in the multi-media communications session (Tang's operating environment uses e-mail and the like in communications between team members (col. 13, lines 5-12, col. 14 lines 15-18, and FIGs. 3, 5-6 and 8); therefore users can setup the email to send new messages, invitation, meeting request or important news arrive to all other teams (or new teams) throughout a Network, and the sender (organizer of the meeting) will receive replications, which indicate accepting, rejecting or deferring informations, from the team members (including new members) ; and
>
> a switched telephone network (note the rejection of claim 1 above for STN) to enable exchange of voice content of the multi-media communications session between voice communications devices of the team members involved in the multi-media communications session (col. 13, lines 5-12, col. 14 lines 15-18, and FIGs. 3, 5-6 and 8).

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The garbled grammar of the Examiner's rejection of claim 63 renders his argument virtually unintelligible. However, the Examiner appears to be equating the "manual" use of e-mail messaging between workgroup members to arrange a meeting with the automated initiation of a multimedia session by a collaboration services suite.

(iv) Brief description of the cited references

United States Patent No. 5,793,365 (Tang et al.) teaches a system and methods which:

> "provides each networked computer user with a user interface displaying visual representations of selected other computer users, generally of those workers in the user's workgroup, and further provides communication mechanisms enabling the user to contact any of the displayed workers. The visual representations of the other users are frequently updated to indicate the activity level of these users. These activity level cues help users predict if the other users are likely to be available for an interaction. The user interface also includes a display portion and mechanism for storing data files and the like so that all workgroup members may accumulate a set of data files commonly used by the workgroup, and may transfer files in this manner to other workgroup members. The data files may be stored in association with specific interactive discussion windows, known as chat rooms, or directly in the user interface." (Abstract)

Thus Tang et al. provides a system for enabling computer (PC) network based collaboration between networked members of a workgroup, and which includes a user interface which displays presence, availability and activity information for each member of a user's workgroup, and facilitates various types of communication between workgroup members. Collaboration between the networked users is facilitated by a communications server 80 (See Tang et al., FIG. 11) which enables a user to initiate and participate in communications sessions with each networked person in the user's contact list. Thus:

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> "A communications server 80 handles communication services between the user's computer 101 and other computers 101 on the network. The communication server 80 has interfaces to various communication applications, such as a video conference server 81, an audio conference server 83, an email application 85, and a text chat application 87. The applications may be conventionally provided as part of the communication infrastructure of the system 100. A suitable communications server 80 and supporting applications is Sun Microsystems ShowMe.™. desktop conferencing system, including ShowMe Video.™. and ShowMe Audio.™." (Col. 12, ln. 61 – col 13, ln.4)

However, Tang et al do not teach or suggest that the system can support communication sessions that are not mediated by the PC network. More particularly, Tang et al do not teach or suggest that the system can support communications over a switched telephone network (STN) such as, for example, the Public Switched Telephone Network (PSTN). Tang et al provide no teaching that initiation of a communication session over an STN is even possible, much less how it may be accomplished. In fact, Tang et al. teach directly away from such functionality by providing a PC network capable of mediating a plurality of different types of communication, including voice communications. Tang et al do not even attempt to solve the problem of facilitating "regular" telephone communications through the PSTN.

United States Patent No. 5,995,492 (Klein et al.) teaches a "digital communication system, which may be a Time Domain Multiple Access system, which uses plural antenna to reduce problems associated with fading, interference and multipath in signals received from mobile, wireless units. The protocol used between the fixed station and the mobile, wireless units provides an opportunity for the fixed station to evaluate the signal received from the wireless unit and to transmit to the wireless unit using the antenna judged to have the best received signal." (Abstract)

Thus Klien et al are primarily directed to solving the problem of poor wireless communications is severe multipath environments (such as within a building). Klien et al's

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solution is to provide a digital communications network with multiple fixed "base stations", each of which includes an antenna coupled to evaluation and selection means. Each base station is coupled to a conventional switch of the telephone network through a Base Station Interface Unit (BSIU). With this arrangement, the base station judged to have the best reception from any particular portable telephone is selected to transmit signals to that telephone. At col 17, line 64 - col. 18, line 28, Klien et al describe an embodiment in which a "portable telephone [22] includes a display which can be programmed from the switch [10] (through the base station) to customize features for the various telephones within a system." (Col 18, lines 64-67). As is clearly described at col. 18 lines 1-28, this capability can be used to customize the display on each mobile telephone.

Klein et al are completely silent with respect to obtaining presence and availability information respecting users of the communication system. Furthermore, applicant can find nothing in the teaching of Klien et al that relates to either "virtual switching points" or switching "from one telephone to a different telephone", as suggested by the Examiner.

(v) Has the Examiner established *prima facie* obviousness of claim 1

MPEP. § 703.02(j) sets out three criteria that must be met by the Examiner in order to establish a *prima facie* case of obviousness.

> "First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings."
>
> "Second, there must be a reasonable expectation of success."
>
> "Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations."

It is submitted that that the Examiner has not met these criteria, and thus has not established *prima facie* obviousness.

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With reference to the first criterion, there is no suggestion or motivation, in either Tang et al or Klien et al themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the Tang et al reference using the teaching of Klien et al or to otherwise combine the teachings of Tang et al and Klien et al in the manner suggested by the Examiner. The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. (MPEP 2143.01, and *In re Mills*, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990))

After extensive reviews of both references, Applicant has been able to discover exactly one point of concordance between the Tang et al and Klien et al references; namely, they both relate to digital communications. However, within the context of digital communications Tang et al and Klien et al are directed to radically different problems, and propose entirely different solutions. As noted above, Tang et al provide a user interface which displays presence, availability and activity information for other PC-based members of the workgroup, and which enables a user to initiate PC-mediated communications with another such PC-based workgroup member. Klien et al teach a digital communication system in which portable telephones include programmable displays. There does not appear to be any reason for these systems to interact, there is no apparent benefit to be obtained by such combination, and neither reference provides any motivation for doing so.

With respect to the third criterion, it is submitted that the cited references, taken alone or in combination, do not teach or suggest all of the limitations of claim 1. In particular, adding the system of Klien et al to that of Tang et al, as suggested by the Examiner, results in a digital (IP) network-based system for PC-based team collaboration as per Tang et al, in which users' portable telephones have programmable displays as per Klien et al. None of this reads onto either of the claimed features of:

> "a collaboration services suite adapted to establish a communications session between two or more members of the team over at least a Switched Telephone Network (STN) in response to a request from any one of the team members ...; and

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> a team member interface adapted to ... enable a team member to request initiation by the collaboration services suite of a communications session with at least one other team member over at least the Switched Telephone Network (STN).

As discussed above, Tang et al provide a digital network capable of supporting various types of PC-mediated communications between networked workgroup members. However, the system of Tang et al does not provide any means of setting up communications over an STN, and Klien et al do not provide the missing teaching.

Finally, it is well established that:

> "To support the conclusion that the claimed invention is directed to obvious subject matter, either the references must expressly or impliedly suggest the claimed invention or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references." *Ex parte Clapp*, 227 USPQ 972, 973 (Bd. Pat. App. & Inter. 1985).

It is submitted that the Examiner has not even attempted to meet this requirement. In particular, while the Examiner has asserted that "[i]t would be obvious ... that a person with ordinary skill in the art would want to have Klein's virtual switching feature in Tang's communication devices ", the Examiner has not attempted to show any relationship between his purported combination and the present invention as defined in claim 1.

In particular, the Examiner has asserted that his combination would provide " ... an ultimate implementation when user can manually control virtual switches to avoid network congestion ". However, this object is utterly irrelevant to the present invention. As discussed above, the present invention provides a distributed application for facilitating collaboration between members of a team, which includes a "collaboration services suite adapted to establish a communications session between two or more members of the team over at least a Switched Telephone Network (STN) in response to a request from any one of the team members ...; and

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a team member interface adapted to ... enable a team member to request initiation by the collaboration services suite of a communications session with at least one other team member over at least the Switched Telephone Network (STN)" The present invention is not concerned with "virtual switches" in portable telephones, and does not attempt to provide users with manual control of such switches. Furthermore, the present invention is not concerned with how such functionality might be used to "avoid network congestion". Thus the Examiner has not attempted to present any line of reasoning (convincing or otherwise) as to how the present invention, as defined in claim 1 is rendered obvious by his combination of references.

In light of the foregoing, it is submitted that the Examiner has failed to established *prima facie* obviousness of claim 1 in light of the combination of Tang et al and Klien et al.

(vi) Has the Examiner established *prima facie* obviousness of claims 47 and 48

As detailed above, Applicant submits that the Examiner has failed to establish obviousness in respect of claim 1, which is therefore believed to be patentable. Claim 48 depends from claim 47, which in turn is indirectly dependent from claim 1, and thus claims 47 and 48 are believed to be patentable for at least this reason. However, even if applicant's arguments above in respect of claim 1 are unsuccessful, Applicant respectfully submits that the Examiner has not established *prima facie* obviousness of claims 47 and 48 for the following reasons.

Claim 47 defines a limitation that " the collaboration services suite comprises a virtual switching point adapted to:

> establish a call connection between a first service switching point (SSP) in a switched telephone network (STN) and the first voice communications device;
>
> establish a call connection between the first SSP and a second SSP in the STN; and

> establish a call connection between the second SSP in the STN and the second voice communications device to enable voice communications between the first and second voice communications devices..

As noted above, the Examiner's purported reasons for rejecting claim 47 is a mere recitation of the claim itself, with the addition of a reference to col 14, lines 40-58 of Tang et al. Thus the Examiner has made no attempt to show how the cited reference expressly or impliedly suggests the claimed invention. Nor has the Examiner presented any line of reasoning (convincing or otherwise) as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the cited references. In fact, col 14, lines 40-58 of Tang et al read as follows:

> In a preferred embodiment, the communication server 80 selects the highest communication service available on both computers 101, which is typically video-conferencing. In this embodiment, the communication server 80 requests 709 of the communication server 80 on the remote computer 101 the object reference to a video conferencing application 81 on that computer 101. If there is no video-conferencing application 81 on the remote computer 101, there will be an error message, and the local communication server 80 selects another communication service, such as audio 83, text chat 87, or the like, informing the user of the same. If none of these synchronous mechanisms are available, the email application 85 may be selected. The remote communication server 80 returns 711 the appropriate object reference, and the local communication server 80 invokes 713 both its local equivalent, and using the received object reference, the remote communication service (715). In an alternate embodiment, the user selects the communication service level directly.

The person of ordinary skill in the art will immediately, and without difficulty, recognise that this passage teaches that the communication server 80 implements an algorithm which will select the highest (i.e. the best) available communications service for

communications between networked workgroup members. Thus the communication server 80 first selects video-conferencing between the computers 101. If this fails, then the communications server 80 makes further attempts to establish communication between the computers 101, selecting progressively lower services until a communications service available on both computers 101 is found. The person of ordinary skill in the art will also immediately recognise that there is absolutely no relationship whatsoever between such an algorithm and the elements of claim 47. In fact, the person of ordinary skill in the art will recognise that the elements of claim 47 cannot be found anywhere else in the teaching of either Tang et al. or Klien et al. Neither reference mentions a virtual switching point in an STN (noting that it is impossible to confuse a virtual switching point in and STN with Klien et al's virtual switches). Neither reference even mentions a service switching point (SSP) of the STN, and thus neither reference mentions establishing call connections between such SSPs and communications devices.

In light of the foregoing, it is submitted that the Examiner has made no attempt to meet the criteria for showing prima facie obviousness set out in MPEP. § 703.02(j), in respect of claim 47. Nor has the Examiner made any attempt to show how his combination of references renders obvious the elements of claim 47.

Claim 48 is dependent on claim 47, and adds the further limitation that "the call connection between the first and second voice communications devices is completed in part over first and second Enhanced Integrated Services Digital Network User Part (E-ISUP) trunks in the STN"

As detailed above, the Examiner's rejection of claim 48 is based on his rejection of claim 47, thus:

> "As to claim 48, the modified system of Tang teaches a distributed application as claimed in claim 47 ..." (Underlining added)

A review of the Examiner's detailed action shows that the Examiner has not articulated any purported "modified system of Tang" except by reciting the features of claim 47. It

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therefore appears that the Examiner's "modified system of Tang" is, in fact, nothing more nor less than applicant's own claimed invention.

> Any judgment on obviousness is in a sense necessarily a reconstruction based upon hindsight reasoning. But so long as it takes into account only knowledge which was within the level of ordinary skill at the time the claimed invention was made, and does not include knowledge gleaned only from the applicant's disclosure, such a reconstruction is proper. MPEP See *In re McLaughlin*, 443 F.2d 1392, 170 USPQ 209 (CCPA 1971).

It follows therefore, that a rejection based on "knowledge gleaned only from the applicant's disclosure" is improper. It is submitted that, in the present case, the Examiner's purported "modified system of Tang" is extracted solely from applicant's own disclosure (claim 47, in particular). Accordingly, it is submitted that the Examiner's rejection of claim 48 is improper.

Furthermore, the Examiner has asserted that "It would have been obvious at the time of the invention that the E-ISUP of APD could have been implemented in the modified environment of Tang, so that the system can be used to process a variety of connected sources throughout the network." (underlining added) However, the mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. (MPEP 2143.01, and *In re Mills*, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990)) As discussed in detail above, the Examiner's "modified environment of Tang" is extracted solely from applicant's own disclosure, and is utterly unsupported by the teaching of Tang et al or Klien et al. It is therefore manifest that cited references cannot possibly suggest the desirability of the Examiner's combination.

In light of the foregoing, it is submitted that the Examiner has failed to establish *prima facie* obviousness of claims 47 and 48 in light of the combination of Tang et al, Klien et al. and Applicant's Admitted Prior Art..

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(vii) Has the Examiner established *prima facie* obviousness of claim 63

As discussed above with reference to claim 1, there is no suggestion or motivation, in either Tang et al or Klien et al themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the Tang et al reference using the teaching of Klien et al or to otherwise combine the teachings of Tang et al and Klien et al in the manner suggested by the Examiner. Tang et al provide a user interface which displays presence, availability and activity information for other PC-based members of the workgroup, and which enables a user to initiate PC-mediated communications with another such PC-based workgroup member. Klien et al teach a digital communication system in which portable telephones include programmable displays. There does not appear to be any reason for these systems to interact, there is no apparent benefit to be obtained by such combination, and neither reference provides any motivation for doing so.

Furthermore, it is submitted that the cited references, taken alone or in combination, do not teach or suggest all of the limitations of claim 63. In particular, adding the system of Klien et al to that of Tang et al, as suggested by the Examiner, results in a digital (IP) network-based system for PC-based team collaboration as per Tang et al, in which users' portable telephones have programmable displays as per Klien et al. None of this reads onto either of the claimed feature of:

> "a collaboration services suit adapted to establish a multi-media communications session ... using: a data network to enable an exchange of video content ...; and a switched telephone network to enable exchange of voice content of the multi-media communications session ..."

As discussed above, Tang et al provide a digital network capable of supporting multi-media (i.e. video-conference) communications between networked workgroup members. However, the system of Tang et al does not provide any means of setting up communications over the STN, and does not even attempt to establish a multi-media communications session in which the data content and voice content of the session are conveyed through different networks. Klien et al do not provide the missing teaching.

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Finally, it is submitted that the Examiner has not even attempted to " present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references." *Ex parte Clapp*, 227 USPQ 972, 973 (Bd. Pat. App. & Inter. 1985). In particular, while the Examiner has asserted that "[i]t would be obvious ... that a person with ordinary skill in the art would want to have Klein's virtual switching feature in Tang's communication devices ", the Examiner has not attempted to show any relationship between his purported combination and the present invention as defined in claim 63. In particular, the Examiner has made no attempt whatsoever to show " why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references". Instead, the Examiner has merely pointed to e-mail communications in Tang et al., and his "rejection of claim 1 above for STN". However, the Examiner has made no attempt to show how these references relate to, or otherwise render obvious, a system in which a collaboration services suit uses a data network for conveying data content of a multi-media communications session, and an STN for the voice content of that session, as provided in claim 63.

In light of the foregoing, it is submitted that the Examiner has failed to established *prima facie* obviousness of claim 63 in light of the combination of Tang et al and Klien et al.

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9) **Appendix**

Claims involved in the Appeal

1. (Previously Amended) A distributed application for facilitating collaboration between geographically-dispersed members of a team, comprising:

a collaboration services suite adapted to establish a communications session between two or more members of the team over at least a Switched Telephone Network (STN) in response to a request from any one of the team members using dynamic presence and availability information respecting each team member; and

a team member interface adapted to display the dynamic presence and availability information to each member of the team, and to enable a team member to request initiation by the collaboration services suite of a communications session with at least one other team member over at least the Switched Telephone Network (STN).

2. (Original) A distributed application as claimed in claim 1 wherein the collaboration services suite maintains detailed information respecting team members and communications devices associated with team members, the detailed information being used to initiate communications sessions on receipt of the request from any team member.

3. (Original) A distributed application as claimed in claim 2 wherein the team member interface displays only graphical information respecting other team member's communications devices, and team members initiate a communications session without requiring knowledge of a device type, device location or device address of a communications device associated with another team member with which a communications session is established by the collaboration services suite.

4. (Original) A distributed application as claimed in claim 3 wherein the graphical information displayed by the team member interface is derived in part from an active profile for each team member.

5. (Original) A distributed application as claimed in claim 4 wherein the graphical information displayed by the team member interface is derived in part from the dynamic presence information obtained by determining the presence and state of communications devices specified in the active profile.

6. (Original) A distributed application as claimed in claim 1 wherein the team member initiates the communications session by selecting a communications icon associated with a personal identifier that represents the at least one other team member.

7. (Original) A distributed application as claimed in claim 1 wherein the team member initiates the communications session by opening a communications session initiation window, and dragging a personal identifier that represents the at least one other team member into a predetermined area of the window.

8. (Original) A distributed application as claimed in claim 6 wherein the team member opens a communications session initiation window by performing an activation operation using a pointing device, after selecting the communications icon.

9. (Original) A distributed application as claimed in claim 6 wherein the communications session initiation window permits the team member to optionally enter a topic to be discussed during the communications session.

10. (Original) A distributed application as claimed in claim 9 wherein the communications session initiation window further permits the team member to optionally enter a an invitation message related to the communications session.

11. (Original) A distributed application as claimed in claim 9 wherein the communications session initiation window further permits the team member to attach meeting notes input during the communications session.

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12. (Original) A distributed application as claimed in claim 6 wherein a start communications session message is sent to the collaboration services suite when the team member performs a selection to begin the communications session.

13. (Original) A distributed application as claimed in claim 12 wherein the message sent to the collaboration services suite is received by a connection manager that is adapted to initiate the communications session in response to the message received from the team member.

14. (Original) A distributed application as claimed in claim 13, wherein the message comprises at least one of:

information indicative of a type of communications session to be initiated; and

a personal identifier associated with the at least one other team member invited to join the communications session.

15. (Original) A distributed application as claimed in claim 6, wherein selecting a communications device associated with the other team member is accomplished by selecting one of a plurality of communications icons using one or more of:

information indicative of one of a voice, text or multi-media type of communications session; and

preference information provided by the other team member and indicative of one or more preferred communications devices to be used for communications sessions.

16. (Original) A distributed application as claimed in claim 1, wherein the collaboration services suite maintains a session record including session information related to respective communications sessions.

17. (Original) A distributed application as claimed in claim 16, wherein the session information comprises at least one of:

a participant record identifying each team member participating in the communications session; and

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a topic of the communications session.

18. (Original) A distributed application as claimed in claim 16, wherein the team member interface is adapted to enable a team member to interact with the collaboration services suite to mark the communications session as either one of a public and a private communications session.

19. (Original) A distributed application as claimed in claim 17, wherein the team member interface is adapted to display at least a portion of the session information respecting each public communications session to every member of the team.

20. (Original) A distributed application as claimed in claim 17, wherein the team member interface is adapted to display at least a portion of the session information respecting a private communications session to only those members of the team who are participants in the private communications session.

21. (Original) A distributed application as claimed in claim 16, wherein the respective session record is archived following completion of the communications session.

22. (Original) A distributed application as claimed in claim 1, wherein the collaboration services suite is adapted to facilitate exchange of text messages between team members participating in a communications session.

23. (Original) A distributed application as claimed in claim 1, wherein a session window of the team member interface displays for each public communications session at least one of:

a team identifier;

a discussion topic; and

a personal identifier associated with each party to the communications session.

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24. (Original) A distributed application as claimed in claim 1, wherein a archive record is stored each time a communications session is terminated and the archive record comprises at least one of:

a communications session type;

a team identifier;

a discussion topic;

a personal identifier associated with each party to the communications session;

a session start and stop time;

a session identification number; and

any text messages exchanged between the parties during the communications session.

25. (Original) A distributed application as claimed in claim 24 wherein the personal identifier is a team member identifier if the party is a team member.

26. (Original) A distributed application as claimed in claim 1, wherein the collaboration services suite is adapted to track each communications session, and to store an address of a preferred text communications device associated with each team member that is a participant in the communications session, so that text messages associated with the communications session are forwarded to the preferred text communications device of each participant.

27. (Original) A distributed application as claimed in claim 26, wherein the selected text communications device is selected using preference information provided by the respective team member to the collaboration services suite.

28. (Original) A distributed application as claimed in claim 22, wherein the collaboration services suite is adapted to:

receive a text message from a party in a communications session; and

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forward the text message to the respective text communications device associated with each party to the communications session.

29. (Original) A distributed application as claimed in claim 28, wherein the party information further comprises a class identification designating respective parties as one of a participant and a monitor of the communications session.

30. (Original) A distributed application as claimed in claim 29, wherein the collaboration services suite is adapted to forward to each party to the communication session any text message related to the communications session that is received from a participant in the communications session, and to discard any text message related to the communications session that is received from a monitor of the communications session.

31. (Original) A distributed application as claimed in claim 22, wherein the collaboration services suite is further adapted to enable a new party to join the communications session.

32. (Original) A distributed application as claimed in claim 31, wherein, when the new party is a member of the team, the collaboration services suite is adapted to enable the new party to join the communications session as either a monitor or a participant.

33. (Original) A distributed application as claimed in claim 32, wherein, when the communications session is a public communications session, the team member interface is adapted to enable a team member to join the public communications session as the new party, independently of an invitation from any existing party to the public communications session.

34. (Original) A distributed application as claimed in claim 33, wherein, when the team member joins the public communications session as a participant, the collaboration services suite is adapted to forward a an announcement to each of the parties to the public communications session to advertise of the presence of the new party.

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35. (Original) A distributed application as claimed in claim 31, wherein the collaboration services suite is adapted to receive an add-message from an existing party to the communications session, the add message containing at least information identifying the new party, and to forward an invitation message to the identified new party inviting the new party to join the communications session.

36. (Original) A distributed application as claimed in claim 35, wherein the invitation message comprises at least at one of:

an identifier of the team member who sent the invitation;

a topic of the communications session;

a message related to the discussion;

a list of participants in the communications session; and

a list of invitees to the communications session.

37. (Original) A distributed application as claimed in claim 35, wherein the team member interface is adapted to enable the new party to send a response message to the collaboration services suite in response to the invitation.

38. (Original) A distributed application as claimed in claim 37, wherein the response message comprises any one of:

a decline message indicating that the new party wishes to decline the invitation;

a join message indicating that the new party wishes to join the communications session; and

a deferral message indicating that the new party wishes to join the communications session at a later time.

39. (Original) A distributed application as claimed in claim 38, wherein, when the response message is a decline message, the collaboration services suite is adapted to

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forward an invitation declined message to the existing party from which the add-message was received.

40. (Original) A distributed application as claimed in claim 38, wherein, when the response message is a join message, the collaboration services suite is adapted to add the new party to the communications session and to notify each party to the communications session that the new party has joined the communications session.

41. (Original) A distributed application as claimed in claim 38, wherein, when the response message is a deferral message, the collaboration services suite is adapted to advise the existing parties to the communications session of the deferral.

42. (Original) A distributed application as claimed in claim 1, wherein the collaboration services suite is adapted to facilitate voice communications sessions between parties to the communications session.

43. (Original) A distributed application as claimed in claim 42, wherein communications session information displayed on the team member interface comprises at least one of:

an identifier associated with the team;

a personal identifier associated with each party participating in the communications session;

text information describing a session topic;

a record of one or more meeting notes entered by each party to the communications session; and

a record of documents shared by the parties to the communications session.

44. (Original) A distributed application as claimed in claim 43, wherein the session topic is defined by a team member at a time of initiation of the communications session.

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45. (Original) A distributed application as claimed in claim 42, wherein the collaboration services suite is adapted to establish a voice communications session between the parties to the communications session.

46. (Original) A distributed application as claimed in claim 45, wherein the voice communications session comprises a two-party voice communications session between first and a second voice communications devices respectively associated with first and second parties to the communications session.

47. (Original) A distributed application as claimed in claim 46, wherein each of first and second voice communications devices have respective unique addresses, and the collaboration services suite comprises a virtual switching point adapted to:

establish a call connection between a first service switching point (SSP) in a switched telephone network (STN) and the first voice communications device;

establish a call connection between the first SSP and a second SSP in the STN; and

establish a call connection between the second SSP in the STN and the second voice communications device to enable voice communications between the first and second voice communications devices.

48. (Original) A distributed application as claimed in claim 47 wherein the call connection between the first and second voice communications devices is completed in part over first and second Enhanced Integrated Services Digital Network User Part (E-ISUP) trunks in the STN.

49. (Original) A distributed application as claimed in claim 46, wherein each of first and second voice communications devices have respective unique extension numbers on an enterprise network connected to the switched telephone network (STN) via a private branch exchange (PBX), and the collaboration services suite sends a connection request message to the PBX to establish a two-party call connection between the first and second voice communications devices within the enterprise network.

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50. (Original) A distributed application as claimed in claim 45, wherein the voice communications session comprises a multi-party voice communications session between three or more voice communications devices respectively associated with three or more parties to the communications session.

51. (Original) A distributed application as claimed in claim 50, wherein each of the voice communications devices have respective unique dial numbers (DNs) in the STN, and the collaboration services suite comprises a virtual switching point (VSP) adapted to establish a call connection between a respective Enhanced Integrated Services Digital Network User Part (E-ISUP) trunk of the STN and each one of the voice communications devices, and to establish a call connection between each E-ISUP trunk and a conference bridge to enable voice communications between each of the voice communications devices via their respective E-ISUP trunks and the conference bridge.

52. (Original) A distributed application as claimed in claim 50, wherein at least two of the communications devices have respective unique extension numbers on an enterprise network connected to the PSTN via a private branch exchange (PBX), and the collaboration services suite is adapted to:

send a connection request message to the PBX to establish a two-party call connection between a first and second voice communications devices on the enterprise network;

send a connection request message to the PBX to establish a third-party call connection between the first voice communications device on the enterprise network and a conference bridge;

send a connection request message to a virtual switching point in the public switched telephone network (PSTN) to establish a call connection between an E-ISUP trunk of the PSTN and a third voice communications device associated with a respective third party to the communications session; and

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establish a call connection between the E-ISUP trunk and the conference bridge to enable voice communications between each of the first voice communications devices via the conference bridge.

53. (Original) A distributed application as claimed in claim 43, wherein the collaboration services suite is adapted to enable a new party to join the communications session.

54. (Original) A distributed application as claimed in claim 53, wherein, when the communications session is a public communications session, the team member interface is adapted to enable a team member to join the public communications session as the new party, independently of an invitation from any existing party to the public communications session.

55. (Original) A distributed application as claimed in claim 53, wherein the collaboration services suite is adapted to:

receive an add-message from an existing party to the communications session, the add message containing at least information identifying the new party; and

forward an invitation message to the identified new party.

56. (Original) A distributed application as claimed in claim 38, wherein, when the response message is a join message, the collaboration services suite is adapted to:

add party information identifying the new party to the session display; and

notify each team member involved in the communications session that the new party has joined the communications session.

57. (Original) A distributed application as claimed in claim 38 wherein, when the response message is a deferral message, the collaboration services suite is adapted to forward the deferral message to the existing party from which the add-message was received.

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58. (Original) A distributed application as claimed in claim 53, wherein the communications session comprises an existing two-party voice communications session between first and a second voice communications devices respectively associated with first and second parties to the voice communications session, and the collaboration services suite is adapted to convert the two-party voice communications session into a multi-party voice communications session.

59. (Original) A distributed application as claimed in claim 58, wherein when each of the first and second voice communications devices have respective DN's on the PSTN, and the existing two-party voice communications session comprises a voice connection between the first and second voice communications devices via respective first and second E-ISUP trunk, the collaboration services suite comprises a virtual switching point adapted to:

release a call connection between the first E-ISUP trunk and the second E-ISUP trunk;

establish a call connection between the first E-ISUP trunk and a conference bridge;

establish a call connection between the second E-ISUP trunk and the conference bridge;

establish a call connection between a third E-ISUP trunk and a respective third voice communications device associated with the new party; and

establish a call connection between the third E-ISUP trunk and the conference bridge.

60. (Original) A distributed application as claimed in claim 58, wherein the existing two-party voice communications session comprises a two-party voice connection between first and second voice communications devices having respective unique extension numbers on an enterprise network connected to the PSTN via a private branch exchange (PBX), and the collaboration services suite is adapted to:

send a connection request message to the PBX to establish a third-party call connection between the first voice communications device on the enterprise network and a conference bridge;

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send a connection request message to a virtual switching point in the PSTN to establish a call connection between an E-ISUP trunk in the PSTN and a third voice communications device associated with the new party; and

establish a call connection between the E-ISUP trunk and the conference bridge to enable voice communications between each of the voice communications devices via the conference bridge.

61. (Original) A distributed application as claimed in claim 53, wherein the communications session comprises an existing multi-party communications session using a conference bridge to connect at least three voice communications devices respectively associated with existing parties to the communications session, and the collaboration services suite is adapted to join the new party to the existing multi-party communications session.

62. (Original) A distributed application as claimed in claim 61, wherein the collaboration services suite comprises a virtual switching point adapted to:

establish a call connection between a respective E-ISUP trunk of the PSTN and the voice communications device associated with the new party; and

establish a call connection between the E-ISUP trunk and the conference bridge to enable voice communications between the each of the voice communications devices via their respective E-ISUP trunk and the conference bridge.

63. (Previously Amended) A distributed application for facilitating collaboration between geographically-dispersed members of a team, comprising:

a collaboration services suite adapted to establish a multi-media communications session between two or more members of the team in response to a request from any one of the team members using: a data network to enable an exchange of video content between data terminals of team members involved in the multi-media communications session; and a switched telephone network to enable exchange of voice content of the multi-media communications session between

voice communications devices of the team members involved in the multi-media communications session.

64. (Original) A distributed application as claimed in claim 63 wherein the distributed application is further adapted to supply each data terminal with a data address of each other data terminal involved in the multi-media communications session to enable automatic setup the exchange of the video data.

65. (Original) A distributed application as claimed in claim 63 wherein the distributed application further enables an exchange of at least one of documents and applications during the multi-media session.

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If any extension of time under 37 C.F.R. § 1,136 is required to obtain entry of this brief, such extension is hereby respectfully requested. If there are any fees due under 37 C.F.R. §§ 1.16 or 1.17 which are not enclosed herewith, including any fees required for an extension of time under 37 C.F.R. § 1.136, please charge such fees to our Deposit Account No. 19-5113.

Respectfully submitted,

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